

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION No. 05-10508 RGS

JOSEPH GENTLE MOOSE BLAKE)

Plaintiff,)

v.)

ROBERT MURPHY & KATHLEEN DENNEHY,)

Defendants.)

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Pursuant to rule 15(a) of the Federal Rules of Civil Procedure, the plaintiff, Joseph Gentle Moose Blake, hereby moves this Honorable Court for Leave to File a Second Amended Complaint. As grounds therefore, the plaintiff states that he has recently retained pro bono counsel, and wishes to file an amended pleading that states his claims in a more clear and concise manner, and in a manner which better comports with the Federal Rules of Civil Procedure. The interests of justice will be served by such a pleading, as plaintiff's counsel intends to simplify the pleading for the court and all responding parties. Moreover, the defendants will in no way be prejudiced, and have in fact assented to this motion through counsel. The plaintiff agrees to give the defendants 30 days to file a responsive pleading, should the Court find such additional time is just. This matter has not yet been scheduled for trial.

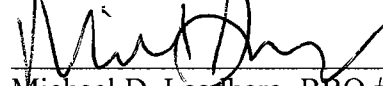
WHEREFORE, the plaintiff respectfully requests leave of Court to file a Second Amended Complaint.

The Plaintiff,

JOSEPH GENTLE MOOSE BLAKE,

By his attorney,

PIERCE, DAVIS & PERRITANO, LLP

A handwritten signature in black ink, appearing to read "Michael D. Leedberg", is written over a horizontal line.

Michael D. Leedberg, BBO #660832

Ten Winthrop Square

Boston, MA 02110

(617) 350-0950

Dated: March 15, 2007

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DISTRICT OF MASSACHUSETTS

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CERTIFICATION OF ASSENT

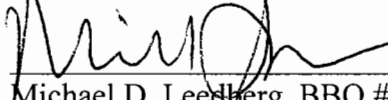
Counsel for the plaintiff, Joseph Gentle Moose Blake, hereby certifies that, pursuant to Local Rule 7.1(A)(2), I was able to confer with defendants' counsel on March 14, 2007 at 1:45 P.M., and during that conference, defendants' counsel assented to the defendant's Motion for Leave to File Amended Complaint.

The Plaintiff,

JOSEPH GENTLE MOOSE BLAKE,

By its attorneys,

PIERCE, DAVIS & PERRITANO, LLP



Michael D. Leedberg, BBO #660832

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Dated: March 15, 2007